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August 9, 2005

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation in CC Docket Nos. 96-45, 98-171, 90-571, 92-237,
99-200, 95-116, 98-170, and NSD File No. L-00-72

Dear Ms. Dortch:

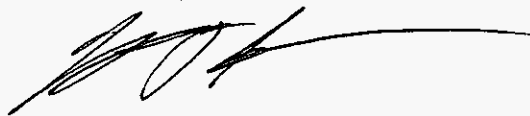
On August 8, 2005, F. J. Pollak, President and Chief Executive Officer of TracFone Wireless, Inc., and I met with Narda Jones, Cathy Carpino, Greg Guice, Rodger Woock, Richard Lerner, James Lande, and James Eisner, all of the Wireline Competition Bureau.

During this meeting, we reiterated the positions that TracFone has taken in its filed comments and prior ex partes in the Universal Service Contribution Methodology proceeding. Specifically, we advocated retention and refinement of a revenue-based universal service contribution methodology, and opposed replacement of a revenue-based contribution methodology with methodologies either based on working telephone numbers or network connections. TracFone's opposition to those alternatives is premised both on legal and public policy considerations. We demonstrated that interstate revenues will be sufficient to support the fund in future years, provided that all interstate telecommunications revenues are assessed. For example, elimination of the wireless safe harbor currently set at 28.5 percent would significantly increase the level of assessable interstate revenues. In addition, we described how imposition of a flat charge per working telephone number would significantly increase the costs of telecommunications service to low income consumers. We also explained how such a system would pose profound hardships on providers like TracFone whose services are all prepaid services, who do not render invoices to customers, and who have no means for recovering such flat charges from consumers.

We stated that if the Commission were to adopt a numbers-based contribution methodology, it should allow those providers of interstate telecommunications services who would suffer a material adverse impact of such a system to have the option of continuing to have their universal service contributions assessed based on interstate telecommunications service revenues. In this regard, TracFone suggests that any carrier providing interstate telecommunications services be allowed to continue to contribute to the Universal Service Fund under the current revenue-based methodology if it certifies to the Commission or to the Universal Service Administrative Company that its universal service contribution levels would increase by 50 percent or more under a revised contribution methodology. For carriers electing to continue to contribute based on revenues, the contribution factor would be the factor in effect for the quarter immediately preceding the implementation of a new methodology. In subsequent contribution periods, whenever the Commission revises the per number charge, the revenue-based contribution factor for those carriers electing to contribute based on revenues (subject to the rule described above), the revenue-based contribution factor would be adjusted accordingly. For example, if the per line charge increased from \$1.00 per working telephone number per month to \$1.25 per number per month (a 25 percent increase), then the revenue-based contribution factor would be increased by 25 percent (*e.g.*, if the contribution factor were at the current level for third quarter 2005 of 10.2 percent, it would be raised to 12.75 percent). In situations where a carrier electing to contribute under the revenue-based formula obtains working telephone numbers from an underlying provider, the underlying provider would not be allowed to assess a per number universal service contribution charge on the carrier acquiring the numbers.

Pursuant to Section 1.1206(b) of the Commission's Rules, this notice is being filed electronically in the above-captioned dockets. If you have any questions regarding this matter, please feel free to contact undersigned counsel for TracFone.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mitchell F. Brecher', with a long horizontal flourish extending to the right.

Mitchell F. Brecher

enclosures

cc: Ms. Narda Jones
Ms. Cathy Carpino
Mr. Greg Guice
Mr. Rodger Woock
Mr. Richard Lerner
Mr. James Lande
Ms. Carol Pomponio
Mr. James Eisner